

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN QUINTANA,

Defendant.

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No. 1:15-CR-00432-001 WJ

DEFENDANT'S MOTION TO CONTINUE SENTENCING HEARING

COMES NOW, the defendant, Christian Quintana, through his attorney, Alonzo J. Padilla, Assistant Federal Public Defender, who moves this Court for an order continuing his sentencing hearing currently scheduled for Wednesday, March 30, 2016.

As grounds for this request, counsel for Mr. Quintana states:

1. On October 27, 2015, Mr. Quintana entered a plea of guilty to count one of the Indictment, charging him with Assault With a Dangerous Weapon, in violation of 18 U.S.C. §§ 1153 and 113(a)(3). The plea agreement was entered pursuant to a Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure and stipulates that the term of incarceration should not exceed twenty-four months.

2. Mr. Quintana contacted counsel to request that the matter be continued on the basis that his family would not be able to be here on that date due to a conflict in their schedule. Furthermore, Mr. Quintana's family are still in the process of obtaining letters of support from family, friends and community members to submit to this Court prior to sentencing. The additional time requested by this continuance will also allow Mr. Quintana's family and his attorney to obtain additional mitigation evidence to present to the Court at the time of sentencing.

3. Counsel for the Plaintiff, Assistant United States Attorney David Adams, opposes this request for a continuance of the sentencing hearing.

4. This is Mr. Quintana's second motion to continue his sentencing hearing.

WHEREFORE, Defendant respectfully requests that this Court continue the sentencing hearing currently set for Wednesday, March 30, 2016 for approximately 30 to 45 days.

I HEREBY CERTIFY THAT on March 24, 2016, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing: AUSA David Adams.

/s/ filed electronically

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
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/s/ filed electronically on 3/24/16
ALONZO J. PADILLA, AFPD
Attorney for Defendant